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8 Attorneys for Plaintiff
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 MARSHA GAY REYNOLDS,

16 Defendant.

No. CR 16-0228-CAS

STIPULATION REGARDING REQUEST FOR
(1) CONTINUANCE OF TRIAL DATE AND
(2) FINDINGS OF EXCLUDABLE TIME
PERIODS PURSUANT TO SPEEDY TRIAL
ACT

CURRENT TRIAL DATE: 08/09/16

PROPOSED TRIAL DATE: 11/29/16

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20 Plaintiff United States of America, by and through its counsel
21 of record, the United States Attorney for the Central District of
22 California and Assistant United States Attorney Reema M. El-Amamy,
23 and defendant Marsha Gay Reynolds, by and through her counsel of
24 record, Stuart Goldfarb, hereby stipulate as follows:

25 1. The Indictment in this case was filed on April 8, 2016.
26 Defendants first appeared before a judicial officer of the court in
27 which the charges in this case were pending on April 4, 2016. The
28

1 Speedy Trial Act, 18 U.S.C. § 3161, originally required that the
2 trial commence on or before June 17, 2016.

3 2. On April 22, 2016, the Court set a trial date of May 31,
4 2016. On May 9, 2016, the Court continued the trial date to August
5 9, 2016.

6 3. Defendant is detained pending trial. The parties estimate
7 that the trial in this matter will last approximately three days.

8 4. By this stipulation, the parties jointly move to continue
9 the trial date to November 29, 2016.

10 5. The parties request the continuance based upon the
11 following facts, which the parties believe demonstrate good cause to
12 support the appropriate findings under the Speedy Trial Act:

13 a. Defendant is charged with a violation of 21 U.S.C.
14 §§ 841(a)(1), (b)(1)(A)(ii): Possession with Intent to Distribute
15 Cocaine. The government has produced discovery to the defense,
16 including video surveillance pertinent to the charge. The government
17 has also produced discovery related to a First Superseding Indictment
18 that the government intends of filing this month.

19 b. In light of the foregoing, counsel for defendant
20 represents that additional time is necessary to confer with
21 defendant, conduct and complete an independent investigation of the
22 case, conduct and complete additional legal research including for
23 potential pre-trial motions, review the discovery and potential
24 evidence in the case, and prepare for trial in the event that a
25 pretrial resolution does not occur.

26 c. Defendant believes that failure to grant the
27 continuance will deny her continuity of counsel and adequate
28 representation.

1 d. The government does not object to the continuance.

2 e. The requested continuance is not based on congestion
3 of the Court's calendar, lack of diligent preparation on the part of
4 the attorney for the government or the defense, or failure on the
5 part of the attorney for the Government to obtain available
6 witnesses.

7 6. For purposes of computing the date under the Speedy Trial
8 Act by which defendant's trial must commence, the parties agree that
9 the time period of August 9, 2016 to November 29, 2016, inclusive,
10 should be excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A),
11 (h)(7)(B)(i), and (h)(7)(B)(iv) because the delay results from a
12 continuance granted by the Court at defendant's request, without
13 government objection, on the basis of the Court's finding that: (i)
14 the ends of justice served by the continuance outweigh the best
15 interest of the public and defendant in a speedy trial; (ii) failure
16 to grant the continuance would be likely to make a continuation of
17 the proceeding impossible, or result in a miscarriage of justice; and
18 (iii) failure to grant the continuance would unreasonably deny
19 defendant continuity of counsel and would deny defense counsel the
20 reasonable time necessary for effective preparation, taking into
21 account the exercise of due diligence.

22 7. Nothing in this stipulation shall preclude a finding that
23 other provisions of the Speedy Trial Act dictate that additional time
24 periods be excluded from the period within which trial must commence.

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1 Moreover, the same provisions and/or other provisions of the Speedy
2 Trial Act may in the future authorize the exclusion of additional
3 time periods from the period within which trial must commence.

4 IT IS SO STIPULATED.

5 Dated: July 11, 2016

Respectfully submitted,

6 EILEEN M. DECKER
United States Attorney

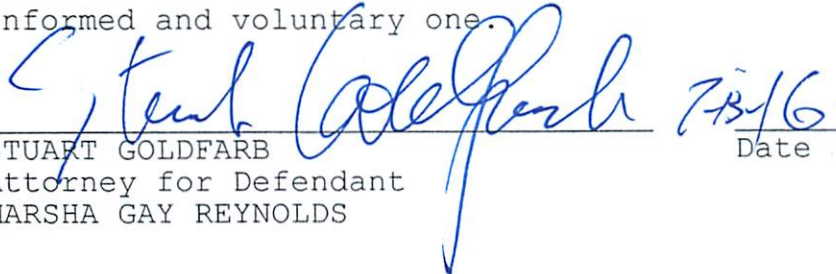
7 LAWRENCE S. MIDDLETON
8 Assistant United States Attorney
9 Chief, Criminal Division

10 /s/

11 REEMA M. EL-AMAMY
Assistant United States Attorney

12 Attorneys for Plaintiff
13 UNITED STATES OF AMERICA

14 I am MARSHA GAY REYNOLDS attorney. I have carefully discussed
15 every part of this stipulation and the continuance of the trial date
16 with my client. I have fully informed my client of his Speedy Trial
17 rights. To my knowledge, my client understands those rights and
18 agrees to waive them. I believe that my client's decision to give up
19 the right to be brought to trial earlier than November 29, 2016 is an
20 informed and voluntary one.

21 
22 STUART GOLDFARB
23 Attorney for Defendant
MARSHA GAY REYNOLDS

Date

24 I have read this stipulation and have carefully discussed it
25 with my attorney. I understand my Speedy Trial rights. I
26 voluntarily agree to the continuance of the trial date, and give up
27
28

1 my right to be brought to trial earlier than November 29, 2016.

2 M. Reynolds
3 MARSHA GAY REYNOLDS
4 Defendant

07 / 14 / 2016
Date